

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JAMES J. GEEZE, JR. and	:	CHAPTER 13
LISA IRENE GEEZE	:	
Debtor	:	
	:	
CHARLES J. DEHART, III	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
JAMES J. GEEZE, JR. and	:	
LISA IRENE GEEZE	:	
Respondent	:	CASE NO. 5-16-bk-02980

OBJECTION TO DEBTORS' EXEMPTIONS

AND NOW, this 20th day July, 2020, comes Charles J. DeHart, III,

Standing Chapter 13 Trustee, and objects to the debtors exemptions for the following reason(s):

1. Debtors exemption of 100% of Fair Market Value without proof of the asset's value deprives unsecured claimants of the asset's value to the estate if it was liquidated under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's  
Objection to Debtors' Exemptions.

Respectfully submitted,

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717)566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 20th day July, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Philip Stock, Esquire  
706 Monroe Street  
Stroudsburg, PA 18360

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee